

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of)	RM No. 10403
Part 90 Rules Governing)	
Location and Monitoring Service)	

To: Chief, Wireless Telecommunications Bureau

Erratum^{*}

**Request for Extension of Time
to Submit Comments**

I, Warren C. Havens, along with Telesaurus Holdings GB LLC in which I have controlling interest, hold most of the A-block geographic-area Location and Monitoring Licenses in the nation.

Pursuant to section 1.46(c) of the Commission rules (motions for extension of time made less than 7 days prior to the filing date): the undersigned request permission to submit Comments on the Progeny Petition for rule making in the Location and Monitoring Service, RM No. 10403, by the end of Wednesday, May 15th. The current due date for Comments April 10, 2002.¹ Thus, the request is for three additional business days.²

^{*} Date of submission at end of document corrected. No other changes.

¹ See Public Notice, April 10, 2002, DA 02-817.

² In email form, this request was sent to David Furth at the Wireless Telecommunications Bureau, with an email copy sent to the legal counsel for Progeny, Janice Obuchowski, on Friday May 3, 2002. Today, Ms. Obuchowski notified the undersigned by telephone that Progeny did

I make this request to be able to submit Comments that incorporate important further input I am seeking from several parties, including from Progeny counsel, persons with ITS America, and equipment vendors that may make product for LMS Multilateration licenses, and to complete some relevant research into Part 15 use in the LMS bands, current location and monitoring technologies, etc.

In furtherance of these purposes, last week I attended the 4-day annual meeting and exposition of the Intelligent Transportation Society of America, of which I am a member. Also, since the Public Notice of the Progeny Petition, I have undertaken other extensive due diligence to prepare Comments, including meetings at the week-long International Wireless Communications Exposition (IWCE) that took place the week before last (meetings with Motorola, EADS, Fox Ridge Communications, Microwave Data Systems, United Telecom Council, and APCO regarding LMS equipment and service issues), and the week before that, travel for meeting with the corporate officers involved in Wireless and Intelligent Transportation Systems at Science Applications International Corporation in San Diego.

If this request is granted, then as noted above, my Comments will be substantially enhanced and will contribute to a more complete and relevant record in this proceeding which in turn will expedite sound understanding and decision on the subject LMS rule change matters.

To my knowledge, no other party or deadline would be adversely affected by a grant of this request. (Also, see footnote 2 above regarding consent by Progeny.)

not oppose this Request for Extension of Time and that she would email Mr. Furth of this position.

Pursuant to section 1.46(c), the undersigned provided oral notice (via telephone voice mail) at the end of last week to the Bureau (to David Furth) and to counsel for Progeny, Janice Obuchowski at 202 371 2220, of the filing of this request.

Please inform me as soon as possible if this request is granted or denied so that I can plan accordingly.

Respectfully submitted, May 6, 2002

Warren Havens

Warren C. Havens,
for himself and as President of
Telesaurus Holdings GB, LLC

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